

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

08 Cr. 1220 (PKC)

- against -

JOHN A. GOTTI,
Defendant.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and the exhibits thereto, JOHN A. GOTTI will move this Court, before the Honorable P. Kevin Castel, at the courthouse located at 500 Pearl Street, New York, New York, at a date and time to be set by the Court, for an order, pursuant 18 U.S.C. §3145 (b), revoking the order of detention issued by Magistrate Judge Ronald L. Ellis and granting defendant bail pending trial.

Dated: New York, New York
January 5, 2009

Respectfully submitted,

/s/
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